

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

SANDRA RODRÍGUEZ COTTO;
RAFELLI GONZÁLEZ COTTO,

Plaintiffs,

v.

WANDA VÁZQUEZ GARCED, Governor of
Puerto Rico; INÉS DEL C. CARRAU-
MARTÍNEZ, Interim Secretary of
Department of Justice of Puerto Rico;
PEDRO JANER, Secretary of Puerto Rico
Department of Public Safety; HENRY
ESCALERA, Puerto Rico Police
Commissioner, all in their official capacities,

Defendants.

Civil Action No.: 3:20-01235-PAD

JOINT MOTION IN COMPLIANCE WITH COURT ORDER

COME NOW Plaintiffs and Defendants, through their undersigned attorneys, and respectfully state as follows:

1. In its text Order of September 22, 2020, Dkt. No. 77, the Court ordered the parties to confer and advise the Court on what the next steps should be in the litigation.
2. Having met and conferred, the parties now respectfully advise the Court that they believe the Court should conduct an argumentative hearing on Plaintiffs' renewed motion for preliminary injunction, Dkt. No. 48.
3. As the parties' briefs make clear, they agree that the presence or absence of chill to Plaintiffs' journalistic sources is irrelevant to the standing analysis. *See* Dkt. No. 50 at 16; Dkt. No. 62 at 7; Dkt. No. 70 at 6; Dkt. No. 74 at 2. The parties therefore respectfully submit that

Plaintiffs' motion for preliminary injunction can be resolved on the record currently before the Court without resort to discovery or an evidentiary hearing.¹

4. The parties accordingly propose that the Court hold a hearing on Plaintiffs' renewed motion for preliminary injunction to address any questions the Court might have regarding the parties' submissions.

I HEREBY CERTIFY that the undersigned attorney electronically filed the foregoing with the Clerk of the Court, which will send notification of such filing to the parties subscribing to the CM/ECF System.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of September 2020.

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¹ However, if the Court were to find that the allegations regarding the journalistic sources, were still a central issue in the instant case for the standing inquiry, Defendants reserve the right to request a limited discovery and an evidentiary hearing to address that matter. Further, if the court were to address the merits of the preliminary injunction and make factual determinations that were not stipulated, defendants reserve the right to request a limited discovery and an evidentiary hearing. Plaintiffs reserve the right to rely on all the evidence in the record.

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**Pro hac vice
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